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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JANE DOE 1, JANE DOE 2, AND JANE DOE 3, CASE NO:

Plaintiffs,

vs.

COMMUNITY MEDICAL CENTERS, INC., dba
DIXON FAMILY PRACTICE; and DOES 1
through 50, Inclusive,

Defendants.

**PLAINTIFFS' MOTION TO PROCEED
UNDER PSEUDONYMS**

Plaintiffs JANE DOE #1, JANE DOE #2 and JANE DOE #3 (Plaintiffs) respectfully request this Court's leave to proceed under pseudonyms to protect their identities from public disclosure while they pursue their right to file a Complaint with this Court.

Proceeding under pseudonyms is necessary to protect the Plaintiffs and their families from undue embarrassment, harassment, discrimination, and violence because of the nature of Plaintiff's claims against the Dr. Zhu and Community Medical Centers.

For additional background, please see Complaint for Damages filed on June 25, 2025, in the above-referenced matter.

Allowing Petitioners to proceed under pseudonyms causes no prejudice to the parties in this case.

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1 **CONCLUSION**

2 All three plaintiffs would be at risk of great harm if their identities were revealed. Permitting
3 them to proceed anonymously would not materially harm the public interest in open court proceedings;
4 nor would it prejudice the defendant.

5 Therefore, the Petitioners should be permitted to proceed under pseudonyms in this action.

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7 Dated: June 25, 2025

IKUTA HEMESATH LLP

8 By: 

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